

DICKSTEINSHAPIRO_{LLP}

1825 Eye Street NW | Washington, DC 20006-5403
TEL (202) 420-2200 | FAX (202) 420-2201 | dicksteinshapiro.com

August 29, 2008

By Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W., Room TW-325
Washington, DC 20554

Ex Parte Communication

Re: True LD, LLC and STi PREPAID, LLC
WC Docket No. 08-92

Dear Ms. Dortch,

On August 13, 2008, counsel for APCC Services received the enclosed letter filed by Jeffrey Larsen in APCC Services' pending informal complaint proceeding against True LD, LLC ("True LD"), the assignor in the instant transaction.¹ In the enclosed letter, Mr. Larsen, who is chairman and managing member of True LD,² acknowledges that he is the "manager" of West Star³ and Global Access.⁴ In its earlier submissions, APCC Services pointed out that both these companies are involved in apparent multiple violations of FCC Rules.⁵ To the knowledge of APCC Services, this is the first time that Mr. Larsen has complied with any Commission order to respond to the Commission. Even in this response, he does not begin to address the merits, but

¹ See File No. EB-08-MDIC-0042. The informal complaint also names as defendants two related companies, West Star Telecommunications, LLC ("West Star") and Global Access LD, LLC ("Global Access").

² See True LD's Form 499-A; Letter to Marlene H. Dortch from Robert F. Aldrich in WC Dkt. No. 08-92 (July 22, 2008) (enclosing documents on file with the Arizona Corporation Commission); Comments of APCC Services, WC Dkt. No. 08-92, Exhibit 3 (July 7, 2008) ("APCC Services Comments").

³ In fact, according to FCC documents and other evidence submitted in this proceeding, Larsen is CEO, "sole member" and "sole manager" of West Star. See West Star's Form 499-A; APCC Services Comments, Exhibit 1 at 2 ¶ II(B), Exhibit 2 at 1.

⁴ In fact, the evidence shows that Larsen is president and managing member of Global Access. See Letter to Marlene H. Dortch from Albert H. Kramer and Robert F. Aldrich, filed in WC Dkt. No. 08-92, Exhibit 1 (July 30, 2008) ("APCC Services Alter Ego Ex Parte"); APCC Services Comments, Exhibit 3.

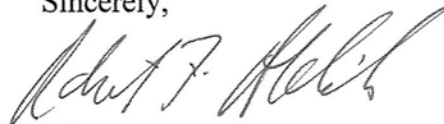
⁵ See, e.g., APCC Services Comments at 3-5; *West Star Telecommunications, LLC*, Notice of Apparent Liability for Forfeiture, NAL/Acct. No. 2008-3209-0001, 23 FCC Rcd 2707 (rel. Feb. 19, 2008) ("*West Star NAL*"); *Global Access, Inc.*, Notice of Apparent Liability for Forfeiture, NAL/Acct. No. 2008-3209-0006, DA 08-1366 (rel. June 10, 2008) ("*Global Access NAL*").

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rather seeks more time to answer, perhaps hoping that, in the meantime, Commission action on the pending asset transfer will enable him to secure his profit from the transaction and thereby to avoid the need to provide any further response to the pending complaints and NALs.

As discussed in the earlier letters, the Commission should not grant the above-referenced applications until it has fully investigated the relationships among the various entities and Mr. Larsen and their respective involvement in the various violations of Commission rules. The Commission should not act on the pending transfer application until, at a minimum, both Jeff Larsen and the Larsen-owned carriers (1) resolve the pending NALs, (2) correct the violations raised in those proceedings by responding to the pending informal complaints, and (3) submit to the Commission's jurisdiction in all pending NAL and complaint proceedings. Further, in light of the history of evasion by these companies and the consequent danger that there will be insufficient assets to satisfy Commission orders to pay compensation, the Commission should require True LD to post security, out of the proceeds of the sale, sufficient to cover the total amount of unpaid compensation alleged in the pending complaints.

Sincerely,

A handwritten signature in cursive script, appearing to read "Albert H. Kramer" and "Robert F. Aldrich".

Albert H. Kramer
Robert F. Aldrich

Enclosure

AHK/rw

**West Star Telecommunications, LLC
Global Access LD, LLC**

August 13, 2008

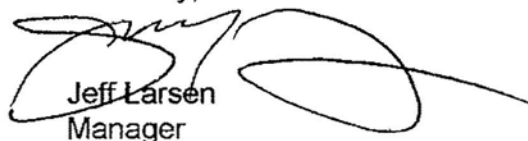
Tracy Bridgham
Special Counsel
Market Disputes Resolution Division
Enforcement Bureau
Federal Communications Commission
445 Twelfth St., S.W.
Washington D.C. 20554

**RE: Request for Extension of Time Informal FCC Complaint on behalf of
West Star Telecommunications, LLC and Global Access LD, LLC
File No, EB-08-MDIC-0042**

Dear Ms. Bridgham:

I am writing to request an extension to respond to the Informal FCC Complaint filed against West Star Telecommunications, LLC and Global Access LD, LLC. I have attempted to retain two separate attorneys in Salt Lake City, Utah and both attorneys have had a conflict of interest with my companies. I just received the last rejection for representation this morning. I am requesting the extension of time so that my companies may have benefit of counsel when I respond to this complaint. I respectfully request an extension of 30 days so that I may retain counsel and have my attorney respond in this matter. I have faxed and mailed this letter to APCC Services today as well. Please feel free to respond to me at ~~1-801-792-4341~~ or 801-792-4341.

Sincerely,



Jeff Larsen
Manager

West Star Telecommunications, LLC
Global Access LD, LLC